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18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC., FIDELITY
20 NATIONAL TITLE INSURANCE COMPANY, and
21 LAWYERS TITLE OF NEVADA, INC.

22 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
23 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

WELLS FARGO BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-CV-00112-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTIONS TO DISMISS,
OR IN THE ALTERNATIVE,
SUMMARY JUDGMENT, AND
OPPOSE COUNTERMOTION FOR
PARTIAL SUMMARY JUDGMENT
(ECF Nos. 31-35)**

FIRST REQUEST

COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”), Fidelity National Title Insurance Company (“Fidelity”) and Lawyers Title of Nevada, Inc. (“Lawyers Title”) (collectively “Defendants”) and plaintiff Wells Fargo Bank, National Association (“Wells

1 Fargo”), by and through their respective attorneys of record, which hereby agree and stipulate as
2 follows:

3 1. On January 19, 2021 Wells Fargo filed its complaint in the Eighth Judicial District
4 Court for the State of Nevada;

5 2. On January 20, 2021, Fidelity removed the instant case to the United States District
6 Court for the State of Nevada (ECF No. 1);

7 3. On May 12, 2021 FNTG, Fidelity, and Lawyers Title moved to dismiss Wells
8 Fargo’s complaint (ECF Nos. 25-27), with Lawyers Title’s motion to dismiss containing an
9 alternative request for a grant of summary judgment (ECF No. 28);

10 4. On May 26, 2021, Wells Fargo filed its responses to FNTG, Fidelity, and Lawyers
11 Title’s motions to dismiss (ECF Nos. 31, 33, 34), its response to Lawyers Title’s alternative
12 motion for summary judgment (ECF No. 32) and filed a countermotion for partial summary
13 judgment to Fidelity’s motion to dismiss (ECF No. 35);

14 5. Defendants request a further four-week extension of their respective deadlines to
15 reply in support of the motions to dismiss, a three-week extension of Lawyers Title’s deadline to
16 reply in support of its alternative motion for summary judgment, and a two-week extension of
17 Fidelity’s deadline to oppose the countermotion for summary judgment, through and including
18 Wednesday, June 30, 2021 (such that all of Defendants’ replies and oppositions are due on that
19 date), for Defendants to file their respective responses to Wells Fargo’s oppositions and
20 countermotion to afford Defendants’ counsel additional time to review and respond to Wells
21 Fargo’s complaint.

22 6. Counsel for Wells Fargo does not oppose the requested extension;

23 7. This is the first request for an extension made by counsel for Defendants, which is
24 made in good faith and not for the purposes of delay.

25 8. This stipulation is entered into without waiving any of Defendants’ objections
26 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to reply in support of
2 their motions to dismiss and summary judgment and oppose Wells Fargo's counter motion is
3 hereby extended through and including Wednesday, June 30, 2021.

4 Dated: May 28, 2021

SINCLAIR BRAUN LLP

6 By: /s/-Kevin S. Sinclair

7 KEVIN S. SINCLAIR
8 Attorneys for Defendants
9 FIDELITY NATIONAL TITLE GROUP,
INC., FIDELITY NATIONAL TITLE
INSURANCE COMPANY, and LAWYERS
TITLE OF NEVADA, INC.

10 Dated: May 28, 2021

WRIGHT FINLAY & ZAK, LLP

12 By: /s/-Christina V. Miller

13 CHRISTINA V. MILLER
14 Attorneys for Plaintiff
15 WELLS FARGO BANK, NATIONAL
ASSOCIATION

15 **IT IS SO ORDERED.**

16 Dated this 30th day of May, 2021.

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19 RICHARD F. BOULWARE
20 UNITED STATES DISTRICT JUDGE
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